

**IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS  
DOMESTIC RELATIONS DIVISION**

**LUNDEN ROBERTS**

**PLAINTIFF**

**V.**

**CAUSE NO. 32DR-19-187-2**

**HUNTER BIDEN**

**DEFENDANT**

**MOTION TO STRIKE AND RESPONSE TO NOTICE OF FRAUD AND  
COUNTERFEITING AND PRODUCTION OF EVIDENCE  
AND INCORPORATED BRIEF IN SUPPORT**

**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Hunter Biden ("Defendant" herein), and files this Motion to Strike and Response to Notice of Fraud and Counterfeiting and Production of Evidence and Incorporated Brief, and would show the following:

**A. Motion to Strike**

Prior to responding to the Notice, Defendant moves to strike the pleading as follows:

A-1. Plaintiff filed suit in this cause to establish paternity and for child support against Defendant.

A-2. This Notice of Fraud and Counterfeiting and Production of Evidence ("Notice") purports to be filed by D&A Investigation, Inc. who refers in the pleading to itself as "Intervenor" or "AGENCY" (referred to herein as "AGENCY").

A-3. AGENCY has not sought intervention by application under Arkansas Rule of Civil Procedure 24 into the pending litigation between Plaintiff and Defendant.

A-4. AGENCY is not properly before the Court and has no standing to bring suit.

A-5. The Notice is a scheme by a non-party simply to make scandalous allegations in the pending suit to gain some quick media attention.

**DATE: DECEMBER 23, 2019  
TIME: 16:18:04**

INDEPENDENCE COUNTY, ARKANSAS  
CIRCUIT CLERK GREG WALLS  
FILED FOR RECORD BY  
R SCOTT POLSTON D.C.

A-6. Defendant moves the Court to strike the pleadings of AGENCY per Ark. R. Civ. P. 12(f). (See Rule 12(f) "Motion to Strike - Upon motion made by a party before responding to a pleading or, if no responsive pleading is permitted by these rules, upon motion made by a party within 30 days after the service of the pleading upon him or upon the court's own initiative at any time, the court may order stricken from any pleading any insufficient defense or any redundant, immaterial, impertinent or scandalous matter.")

B. Response

Subject to motion to strike, Defendant responds as follows:

B-1. For answer to Paragraph 1 of the Notice, Defendant admits that Plaintiff has filed to discovery motions, but denies all remaining allegations and demands strict proof.

B-2. For answer to Paragraph 2 of the Notice, Defendant denies that AGENCY is an "Intervener" and is without sufficient knowledge to admit or deny the remaining allegations contained therein and, therefore, denies same and demands strict proof.

B-3. For answer to Paragraph 3 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-4. For answer to Paragraph 4 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-5. For answer to Paragraph 5 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-6. For answer to Paragraph 6 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-7. For answer to Paragraph 7 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-8. For answer to Paragraph 8 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-9. For answer to Paragraph 9 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-10. For answer to Paragraph 10 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-11. For answer to Paragraph 11 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-12. For answer to Paragraph 12 of the Notice, Defendant denies the allegations contained therein and demands strict proof.

B-13. Defendant denies all allegations not admitted to herein and those asserted in the Prayer.

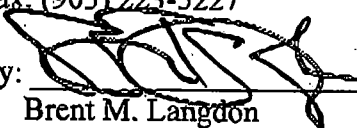
B-14. Defendant specifically reserves the right to amend his Response and allege all defenses, affirmative or otherwise as discovery is completed.

C. Attorney's Fees

WHEREFORE, the Defendant prays that the Notice of Fraud and Counterfeiting and Production of Evidence be struck; for attorney's fees and costs; and or all other just and proper relief to which he may be entitled.

Respectfully submitted,

LANGDON★DAVIS, L.L.P.  
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By:   
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*Attorney for Defendant*

CERTIFICATE OF SERVICE


I certify that a true copy of the above was served on each attorney of record or party on the 23rd day of December 2019, as follows:

Clinton W. Lancaster  
Jennifer M. Lancaster  
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